Case 2:21-mj-30412-DUTY ECF No. 1 Page D 1 Filed 08/30/21 Page 1 of 8 226-9100 Page 1 of 8 2

Telephone: (313) 202-3400

AO 91 (Rev. 11/11) Criminal Complaint

Task Force Officer: Angela Bunch

## UNITED STATES DISTRICT COURT

for the

Factorn District of Michigan

	Eastern District of Mich	nigan		
United States of America				
v. Steve HAGAR	Case	Case: 2:21-mj-30 Judge: Unassign Filed: 08-30-20 IN RE:SEALED	ed, 21 At 12:11 PM	
	CRIMINAL COMPLA	INT		
I, the complainant in this case,	state that the following is true to	the best of my knowled	ge and belief.	
	July and August 2021  Michigan , the defendant(s)		Wayne	in the
Code Section		nse Description		
18 U.S.C. 922(g)(1)	Felon in possession of a	a firearm		
This criminal complaint is bas	ed on these facts:			
Continued on the attached sheet.	an	pela Burch Complainant's	sianaturo	
	Angela E	Bunch - Task Force Office		

Sworn to before me and signed in my presence and/or by reliable electronic means.

Date: August 30, 2021

City and state: Detroit, Michigan

Printed name and title

Judge's signature

Honorable Anthony P. Patti, U.S. Magistrate Judge

Printed name and title

# AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Task Force Officer Angela Bunch, being first duly sworn, hereby depose and state as follows:

#### INTRODUCTION

- 1. I have been a member of the Detroit Police Department for 23 years. Since 2013, I have been assigned to the Firearms
  Investigative Team with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I became a Task Force Officer with ATF in May 2014.
  I also have a Bachelor of Applied Science. I have been involved in numerous investigations related to violations of federal firearms and controlled substances laws. I have utilized a variety of investigative techniques and resources, including physical and electronic surveillance, and undercover activities.
- 2. This affidavit is in support of an application for an arrest warrant for Steve HAGAR (XX/XX/1994) for the crime of being a felon in possession of a firearm in violation of 18 U.S.C. § 922(g)(1).
- 3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show

merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

#### SUMMARY OF THE INVESTIGATION

- 4. I have reviewed known images of Steve HAGAR from the Michigan Secretary of State as well Michigan Department of Corrections. I am able to positively identify HAGAR.
- 5. A review of HAGAR's computerized criminal history reveals two prior felony convictions: stolen property receiving and concealing a motor vehicle in 2013 and delivering/manufacturing a controlled substance in 2018, both in the Third Circuit Court in Detroit.
- 6. On October 10, 2019, Detroit Police Officers arrested HAGAR for carrying a concealed weapon. The case was referred to the United States Attorney's Office for federal prosecution in the Eastern District of Michigan. On November 19, 2019, a federal grand jury in this District returned a one-count indictment, charging HAGAR with being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1). HAGAR is on pretrial release in connection with that case and is awaiting a trial date. He provided a Detroit address as his place of residence for purposes of his supervision.

- 7. During July and August 2021, I reviewed social media posts associated with the Instagram Account 47638235537, Vanity Name: "fn\_juuu" (Subject Account). I observed that HAGAR frequently appears in selfie-style images and videos on the Subject Account, suggesting that he records and personally posts the images and videos. Based on this information along with my training and experience, I believe that HAGAR is an account user of the Subject Account.
- 8. On July 22, 2021, Detroit Police Gang Intel Officer Kenneth Valrie reviewed a series of videos, known as Instagram "stories," which were posted to the Subject Account on July 21, 2021. In these Instagram stories, Officer Valrie observed HAGAR in possession of a firearm. I was able to identify the firearm as a Walther, model PDP, semiautomatic handgun, bearing serial number FDD3685. Below are snapshots obtained from the Instagram story:





- 9. I also consulted with ATF Special Agent Michael Jacobs, an interstate nexus expert, who reviewed the referenced Instagram posts. Special Agent Jacobs advised me that, based on his training and experience, a Walther, model PDP, semiautomatic handgun, bearing serial number FDD3685 would meet the federal definition of a firearm and would have been manufactured outside Michigan.
- 10. A query regarding the serial number observed on the firearm in the Instagram story confirmed that it corresponds to a Walther, model PDP pistol. Further investigation revealed that an individual known to law enforcement purchased the pistol from an FFL in the Eastern District of Michigan on July 19, 2021, just two days before the

Instagram story was posted to the Subject Account. The firearm is not currently registered consistent with Michigan state law.

11. On August 8, 2021, additional Instagram stories were posted to the Subject Account. In these videos, HAGAR appears to be inside a vehicle in possession of two suspected firearms in his lap. One of the firearms appears to be the same Walther pistol depicted above.

Additionally, upon closer review of the videos, HAGAR is driving on W McNichols at Winston Street, in the City of Detroit, Eastern District of Michigan, identifiable by the Rocky's Coney Island and Citgo Gas Station on the corners of the intersection. Below are snapshots from the videos.









12. ATF Special Agent Jacobs, a firearms interstate nexus expert, was given an oral description of the Walther pistol. Based on the verbal description, without physically examining the firearm, Special Agent Jacobs advised me that, based on his training and experience, the firearm meets the federal definition of a firearm and was manufactured outside Michigan and thus traveled in or affected interstate or foreign commerce.

### **CONCLUSION**

13. Based on the above information, there is probable cause to believe that HAGAR, a convicted felon, did knowingly and intentionally possess a firearm, which traveled in and affected interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,

Angela Bunch

Task Force Officer, ATF

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. Anthony P. Patti

United States Magistrate Judge

Date: August 30, 2021